

1 PAUL S. PADDA, ESQ. (NV Bar #10417)
2 Email: psp@paulpaddalaw.com
3 PAUL PADDA LAW, PLLC
4 4560 South Decatur Boulevard, Suite 300
5 Las Vegas, Nevada 89103
6 Tele: (702) 366-1888
7 Fax: (702) 366-1940
8 -and-
9 ANTONIO M. ROMANUCCI, ESQ. (Admitted PHV)
10 Email: aromanucci@rblaw.net
11 PATRICK DRISCOLL, ESQ. (Admitted PHV)
12 Email: pdriscoll@rblaw.net
13 ROMANUCCI & BLANDIN, LLC
14 321 North Clark Street, Suite 900
15 Chicago, Illinois 60654
16 Tele: (312) 458-1000

17 *Attorneys for Plaintiff*

18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

1 KRISTINA KERLUS, an individual;
2 Plaintiff,
3 vs.
4 DR. JENNIFER CORNEAL, in her individual
5 capacity; A. SANTOS, in her individual capacity;
6 CITY OF LAS VEGAS, a municipal corporation;
7 COUNTY OF CLARK, a municipal corporation; LAS
8 VEGAS METROPOLITAN POLICE
9 DEPARTMENT; jointly and severally,
10 Defendants.

11 Case No. 2:24-cv-02352 -APG-DJA

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**STIPULATED DISCOVERY PLAN AND
SCHEDULING ORDER PURSUANT TO FED.
R. CIV. P. 26(f)(3) AND LR 26-1**

[Special Scheduling Review Requested]

1 Plaintiff Kristina Kerlus (“Plaintiff”), Defendant Dr. Jennifer Corneal, Defendant A. Santos, Defendant City of Las Vegas, Defendant County of Clark, and Defendant Las Vegas Metropolitan Police Department (“LVMPD,” collectively “Defendants” and with Plaintiffs, the

PAUL PADDA LAW, PLLC
4560 South Decatur Boulevard, Suite 300
Las Vegas, Nevada 89103
Tele: (702) 366-1888 • Fax (702) 366-1940

1 "Parties") submit this Stipulated Discovery Plan and Scheduling Order pursuant to Fed. R. Civ.
2 P. 26(f) and LR 26-1(b).

3 **I. INFORMATION PURSUANT TO FED. R. CIV. P. 26(f)**

4 **1. Rule 26(f) conference:** Counsel for the parties participated in a Fed. R. Civ. P. 26(f)
5 conference on July 17, 2025. Paul S. Padda participated on behalf of Plaintiff, Lyssa
6 Anderson, Esq. of Kaempfer Crowell participated on behalf of Defendants Angie
7 Santos and Las Vegas Metropolitan Police Department, and Robert W. Freeman, Esq.,
8 of Lewis Brisbois Bisgaard & Smith LLP participated on behalf of Defendants Dr.
9 Jennifer Corneal and County of Clark.

10 **2. The Parties will exchange their respective Initial Disclosures on or before **July 31, 2025**,**
11 fourteen (14) days after the Rule 26(f) Conference. The Parties do not anticipate
12 any changes to the timing, form, or requirement for such disclosures.

13 **3. Subjects on which discovery may be needed:** Unless otherwise limited by
14 subsequent stipulations or orders, the Parties shall be allowed to conduct discovery
15 within the scope of FRCP 26(a).

16 **4. Issues regarding disclosure or discovery of electronically stored information,
17 including the form or forms in which it is produced:** No issues at this time. If any
18 issues arise later, the Parties will meet and confer before involving the Court. The
19 Parties have also undertaken efforts to retain any electronically stored information
20 relevant to this matter and have agreed that, unless the requesting party asks for a
21 definite and specific form, the party producing any electronically stored information
22 need not provide such information in any certain form as long as the form provides
23 the other party reasonable access to the information.

24 **5. Issues about claims of privilege or protection of trial preparation materials:** No
25 issues at this time. If any issues arise later, the Parties will meet and confer before
26 involving the Court.

27 **6. Limitations on discovery:** None.

28

7. Other orders under Rule 26(c) or Rule 16(b) and (c): None as of this date.

II. INFORMATION PURSUANT TO LOCAL RULE 26-1(b) AND LOCAL RULE 26-

3.

1. **Alternative dispute resolution:** The parties certify they have met and conferred about the possibility of using alternative dispute resolution processes. The parties have not agreed to use these processes currently but remain open to considering them after further progress in discovery.

2. Alternative forms of case disposition: The parties certify that they discussed and considered consenting to trial by a magistrate judge under 28 U.S.C. § 636(c) and FRCP 73 and the use of the Short Trial Program (General Order 2013-01). The parties do not consent to these options currently.

3. **Electronic evidence.** The parties certify that they discussed whether they intend to present evidence in electronic format to jurors for the purpose of jury deliberations. The parties intend to meet and confer regarding electronic evidence should any disputes arise.

4. Extensions of discovery deadlines: Pursuant to LR 26-3, a motion or stipulation to any date set by the discovery plan, scheduling order, or other order, must in addition to meeting the requirements of LR IA 6-1, be supported by a showing of good cause for the motion; be received by the court no later than twenty-one (21) days before the expiration of the subject deadline; and any request within twenty-one (21) days of the subject deadline must be supported by a showing of good cause. Any request made after the expiration of the subject deadline will not be granted unless the movant also demonstrates that the failure to act was the result of excusable neglect. The motion or stipulation to extend a discovery deadline or to reopen discovery must include:

(a) A statement specifying the discovery completed;

- 1 (b) A specific description of the discovery that remains to be completed;
- 2 (c) The reasons by the deadline was not satisfied or the remaining discovery
- 3 was not completed within the time limits set by the discovery plan; and
- 4 (d) A proposed schedule for completing all remaining discovery.

6 **III. DISCOVERY PLAN UNDER LOCAL RULE 26-1(b) AND LOCAL RULE 26-3**

7 The Parties propose the following deadlines:

8 **1. Initial disclosures:** July 31, 2025

9 **2. Discovery cut-off:** May 27, 2026, which is three-hundred and sixty-five (365) days
10 from May 27, 2025; the date of the first appearance in this matter. The parties believe
11 that this will be sufficient time to conduct discovery given the number of potential
12 witnesses with knowledge of this matter. Indeed, Plaintiff's claims relate to her arrest
13 related to the death of her child and the subsequent criminal proceedings that spanned
14 a time-period of almost three (3) years. The parties suggest that discovery matters
15 will require additional time and the typical 180 days calculated from the date of the
16 first appearance in this matter is not sufficient. As such, special scheduling review is
17 requested.

18 **3. Amend pleadings or add parties:** February 26, 2026, which is ninety (90) days prior
19 to the close of discovery.

20 **4. Expert disclosures:** March 30, 2026, which is sixty (60) days prior to the close of
21 discovery.

22 **5. Expert rebuttal disclosures:** April 29, 2026, which is thirty (30) days after the
23 deadline to disclose expert disclosures.

24 **6. Dispositive motions:** June 26, 2026, which is thirty (30) days after the close of
25 discovery.

1 **7. Pretrial order:** July 27, 2026. In the event dispositive motions are filed, the deadline
2 for filing the joint pretrial order shall be suspended until 30 days after decision on the
3 dispositive motions or further court order.

4 **8. Pretrial disclosures:** The disclosures required by FRCP 26(a)(3) and any objection
5 thereto shall be included in the Pretrial Order.

6 DATED this 23rd day of July 2025
7 PAUL PADDA LAW, PLLC
8 ROMANUCCI & BLADIN, LLC

9 DATED this 23rd day of July 2025
10 LEWIS BRISBOIS BISGAAD &
11 SMITH, LLP
12 KAEMPFER CROWELL

13 By: /s/ Patrick J. Driscoll
14 PATRICK J. DRISCOLL
15 (Admitted PHV)
16 ANTONION M. ROMANUCCI
17 (Admitted PHV)
18 **ROMANUCCI & BLANDIN, LLC**
19 321 North Clark Street, Suite 900
20 Chicago, Illinois 60654

21 PAUL S. PADDA, ESQ.
22 Nevada Bar #10417
23 4560 South Decatur Boulevard, Suite 300
24 Las Vegas, Nevada 89103

25 *Attorneys for Plaintiff*
26 *Kristina Kerlus*

27 By: /s/ Robert W. Freeman
28 ROBERT W. FREEMAN
1 FRANK A. TODDRE, II
2 Nevada Bar #3062
3 E. MATTHEW FREEMAN
4 Nevada Bar #14198
5 6385 S. Rainbow Blvd, Suite 600
6 Las Vegas, Nevada 89118

7 *Attorneys for Defendants'*
8 *Dr. Jennifer Corneal and County of Clark*

9 By: /s/ Lyssa S. Anderson
10 LYSSA S. ANDERSON
11 Nevada Bar #5781
12 KRISTOPHER J. KALKOWSKI
13 Nevada Bar #14892
14 TRAVIS C. STUDDARD
15 Nevada Bar #16454
16 1980 Festival Plaza Drive, # 650
17 Las Vegas, Nevada 89135

18 *Attorneys for Defendant*
19 *Angie Santos*

PAUL PADDA LAW, PLLC
4560 South Decatur Boulevard, Suite 300
Las Vegas, Nevada 89103
Tele: (702) 366-1888 • Fax (702) 366-1940

ORDER

IT IS SO ORDERED that the parties' stipulated discovery plan and scheduling order (ECF No. 56) is GRANTED.

Dated this 24th day of July, 2025.

DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

PAUL PADDA LAW, PLLC
4560 South Decatur Boulevard, Suite 300
Las Vegas, Nevada 89103
Telephone: (702) 366-1888 • Fax (702) 366-1940